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September 11, 2020

Via ECF

Hon. Jesse M. Furman
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to terminate
ECF No. 222. SO ORDERED.

September 14, 2020

Re: *United States v Arguendas (Jacobb Padin)*
20 Cr. 135 (JMF)

Dear Judge Furman:

Jacobb Padin has been on temporary release since April 8, 2020, because of the threat that COVID-19 posed to his health at the jail. Mr. Padin has shoulder surgery scheduled for September 18, 2020, and Pretrial Services is aware of this and had approved him going to receive the surgery. However, Mr. Padin was recently informed by the surgeon that they would like him to remove his ankle monitor for the MRI and the surgery. I have discussed this matter with Mr. Padin's Pretrial Service Officer, Bernisa Mejia. Ms. Mejia has advised that she has no objection to this request, and that Mr. Padin can go to her office prior to the surgery and have the ankle bracelet removed, and then return to her office following the surgery to have the ankle bracelet reattached. Andrew Chan, AUSA has no objection to this modification of bail. Therefore, we respectfully request that Mr. Padin's bail be modified for Pretrial Services to remove his ankle bracelet for his scheduled surgery on September 18, 2020, and to have the ankle bracelet reattached to his ankle by Pretrial Services following the surgery. Your Honor's time and consideration of this request is greatly appreciated.

Respectfully submitted,

s/

Lorraine Gauli-Rufo
Attorney for *Jacobb Padin*

cc: Andrew Chan, AUSA
Danielle Sassoon, AUSA
Bernisa Mejia, PTSO (*via email*)